

DEPT. OF TRANSPORTATION
DOCKET SECTION

WEATHERSTONE AIR, INC.

98 OCT -2 AM 10: 57

44544

U.S. Department of Transportation Dockets
Docket No. FAA-98-4390 -30
400 Seventh St., SW
Rm. Plaza401
Washington, DC 20590

Dear Sir:

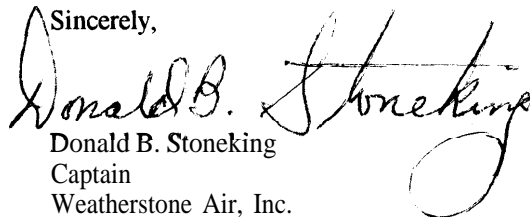
We appreciate the efforts of everyone involved in developing this rule change. With a couple of clarifications, this rule change will give us the option of getting into the ATC system and reduce the number of scud-running flights in marginal VFR conditions. This would be a definite improvement to our operational **safety** and would allow us to better utilize the unique characteristics of the helicopter.

Because of the wording "prevailing weather" included in Option 2- Partially Tabular Format, we prefer this format. The use of "prevailing weather" vs. "chance or slight chance" of certain weather conditions would further facilitate our use of the air **traffic** control system.

This NPRM needs to specifically exclude helicopters from Part 9 1.169 (c.) (1), which states "alternate airport minimums" must be used if published under Part 97. The new rule should add "except helicopters" to Part 9 1.169 (c.) (1). Without this change and the fact that most airports in the northeast carry higher than standard alternate minimums, we would still not be able to find the needed Alternate airports to **file** IFR and fly the "system".

With the above changes, this NPRM will provide us with the safer option of using the ATC system on marginal weather days. Thanks again for all your hard work.

Sincerely,



Donald B. Stoneking
Captain
Weatherstone Air, Inc.
109A Lindbergh Drive
Teterboro, NJ 07608